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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

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In Re:	)	Case No: 22-06407
Courtney Simone Richard	)	
	)	Chapter 13
Debtor.	)	
	)	Judge Timothy A. Barnes

**NOTICE OF MOTION**

TO: See attached service list

Please take notice that on September 21, 2023 at 9:30 a.m., I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, either in courtroom 744 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, or electronically as described below, and present the motion of Courtney Simone Richard to modify her plan and shorten notice, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 329 5276 and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

**Courtney Simone Richard**  
**By: Joseph Olstein**  
Joseph Olstein  
10450 S. Western Ave.  
Chicago, IL 60643  
312-725-4132  
[joseph@olsteinlaw.com](mailto:joseph@olsteinlaw.com)  
/s/ Joseph M. Olstein

**CERTIFICATE OF SERVICE**

I, Joseph Olstein, certify that I served a copy of this Notice and the attached motion on each entity shown on the attached list at the address shown by United States Postage First Class mail, unless indicated otherwise, on the September 6, 2023.

/s/ Joseph M. Olstein

SERVICE LIST:

Thomas Hooper, Chapter 13 Trustee, via ECF

AcceptanceNOW  
Attn: Bankruptcy  
5501 Headquarters Drive  
Plano, TX 75024

Comenity Bank/Torrid  
Attn: Bankruptcy  
Po Box 182125  
Columbus, OH 43218

First Premier Bank  
Attn: Bankruptcy  
Po Box 5524  
Sioux Falls, SD 57117

Global Lending Services LLC  
Attn: Bankruptcy  
Po Box 10437  
Greenville, SC 29603

Illinois Department of Revenue  
PO Box 19035  
Springfield, IL 62794-9035

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Navient  
Attn: Bankruptcy  
Po Box 9500  
Wilkes-Barre, PA 18773

Standard LPC Venture, LLC  
303 Woodcreek Drive  
Bolingbrook, IL 60440

Total Visa/The Bank of Missouri  
Attn: Bankruptcy  
Po Box 85710  
Sioux Falls, SD 57118

Christopher Johnson, attorney for Lake Park Crescent I, LLC via ECF

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	)	Chapter 13
Debtor.	)	
	)	Judge Timothy A. Barnes

**DEBTOR’S MOTION TO MODIFY HIS PLAN AND SHORTEN NOTICE**

The Debtor, by and through her attorney Joseph M. Olstein, and for his motion to modify her plan and shorten notice, states as follows:

1. Debtor filed the instant voluntary petition under Chapter 13 of the Bankruptcy Code on June 7, 2022, and her plan was confirmed on November 15, 2022.
2. Debtor’s confirmed plan provides for an 100% dividend to her General Unsecured Creditors.
3. The Debtor’s motion does not provide for an increase or a decrease in plan payments, and therefore does not include any amended schedules or additional evidence required by the Court’s standing Order #3.
4. The Debtor’s confirmed plan provides for the assumption and cure of a lease with Standard LPC Venture, LLC, (hereinafter “LPC”) her primary residence, in section 6.1 of the plan.
5. Initially, the Debtor indicated in section 6.1 that the arrears due to LPC would be treated in section 3.2.
6. After the Trustee objected to the plan, the debtor removed the language from 6.1 indicating that the arrears on the lease would be treated in section 3.2, but did not remove the treatment of the arrears from section 3.2 of the confirmed plan, which is creating an issue with the administration of the case.
7. The Trustee contacted Counsel for the debtor and indicated that LPC should be removed from section 3.2 so that he can properly administer the case.

8. Currently, the Trustee is holding \$12,604.40 which will be distributed to LPC in the month of September should this motion be granted.
9. The Debtor requests that this motion be heard on shortened notice, so that the Trustee can distribute funds to LPC in September. LPC has appeared in this case via counsel and has filed a proof of claim in the debtor's bankruptcy.

**Wherefore**, the Debtor prays this Court enter an order modifying the debtor's plan pursuant to 11 U.S.C. 1329, and for any additional relief that this Court deems just.

Respectfully Submitted,

/s/ Joseph M. Olstein  
On Behalf of Debtors

Joseph Olstein#6300472  
Olstein Law LLC  
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